

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Sun Chenyan,

Plaintiff,

v.

The Partnerships and Unincorporated
Associations Identified on Schedule "A,"

Defendants.

Civil No. 1:20-cv-00220

Hon. Jorge L. Alonso

**NON-PARTY CONTEXTLOGIC INC., D/B/A WISH'S
MOTION FOR EXTENSION OF EXPEDITED DISCOVERY DEADLINE**

Non-party ContextLogic Inc., d/b/a Wish ("Wish") by and through its undersigned counsel, hereby respectfully moves this Court for an extension of time to comply with, and/or file objections to certain requirements set forth in, this Court's January 21, 2020 order ("Order") granting Plaintiff Sun Chenyan's motion for expedited discovery. (Dkt. No. 20.) In support of this motion, Wish states as follows:

1. On January 13, 2020, Plaintiff filed this action against hundreds of merchant Defendants, alleging that products they sold on various online marketplaces, including Wish's online trading platform, infringed her intellectual property rights. Wish is not a party to this action.

2. On January 14, 2020, Plaintiff filed a motion seeking expedited discovery from various non-party service providers to Defendants, including Wish. (Dkt. No. 14.) The discovery that Plaintiff seeks through expedited discovery is

extensive and encompasses information and records that are not normally sought in these types of actions.

3. On January 21, 2020, this Court granted Plaintiff's motion for expedited discovery and ordered that the non-party service providers, including Wish, produce all of the information and documents that Plaintiff requested within five business days of receipt of the Order. (Dkt. No. 20.)

4. Despite her insistence that discovery be "expedited," Plaintiff did not serve Wish with a copy of the Court's Order until January 27, 2020, six days after it issued. Accordingly, Wish currently has until February 3, 2020, to comply with the Order.

5. Since receiving notice of the Court's Order, Wish has been working diligently to comply with Plaintiff's extensive discovery requests, and has provided a substantial amount of the information and documents that Plaintiff requested, including the sales and contact information that Plaintiff would need to identify and serve each Wish Defendant and to assess the scope of each Wish Defendant's allegedly infringing activities. Wish also plans to produce information regarding the Wish Defendants' current merchant account balances as soon as it is able to confirm that information. Nevertheless, due to the broad scope of Plaintiff's discovery requests and difficulties in accessing and compiling the requested records and information, as well as internal delays caused by business closures in observance of the Chinese New Year, Wish anticipates that it will be unable to fully respond and/or object to certain

of Plaintiff's discovery requests within the very narrow timeframe provided by the Court's Order.

6. On January 30, 2020, Wish's counsel contacted Plaintiff's counsel to ask whether he would agree to an extension of the time for Wish to produce additional information and, if unable to reach an agreement with Plaintiff as to the remainder of information to be produced, to file an objection with the Court. Plaintiff's counsel stated that he would not agree to Wish's request at this time, and demanded that Wish produce all remaining information immediately.

7. Wish takes the Court's Order seriously, and will continue to work as diligently as possible either to comply with it or, as appropriate, meet-and-confer with Plaintiff's counsel regarding potential limitations on the information and documents Plaintiff's counsel seeks. But for the foregoing reasons, Wish respectfully requests a moderate extension of its deadline to comply with the Order and/or object to certain requirements therein.

WHEREFORE, for the reasons set forth above, Wish respectfully requests that the Court extend the deadline for Wish to comply with, and/or file objections to certain requirements set forth in, the Court's January 21, 2020 Order by two weeks, to February 17, 2020.

Dated: January 31, 2020

Respectfully submitted,

/s/ William E. Ridgway

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*Counsel for Non-party ContextLogic Inc.
d/b/a Wish*

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, I caused a true and correct copy of the foregoing Motion for Extension of Expedited Discovery Deadline to be filed by the Court's CM/ECF filing system, which will send electronic notification of such filing to all counsel of record.

/s/ William E. Ridgway

William E. Ridgway